

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ZAFTR INC. n/k/a SVELLA
FINANCIAL CORP.

Plaintiff,

v.

KEVIN JAMESON LAWRENCE,
ESQUIRE; BVFR & ASSOCIATES,
LLC; JOHN KIRK, ESQUIRE AND
KIRK LAW PLLC

Defendants.

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: CIVIL ACTION
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: NO. 21-2177
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: JURY TRIAL DEMANDED
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: ORAL ARGUMENT REQUESTED
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**PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT
AS TO COUNT I OF THE COMPLAINT**

Plaintiff Zaftr Inc. (“Zaftr” or “Plaintiff”), by and through its undersigned counsel, hereby moves for summary judgment as to Count I of the Complaint for breach of contract against Defendants BVFR & Associates, LLC and Kevin Jameson Lawrence, Esquire (the “Lawrence Defendants”), and Defendants John Kirk, Esquire and Kirk Law PLLC (the “Kirk Defendants”). As set forth more fully in the accompanying Memorandum of Law and Plaintiff’s Statement of Undisputed Material Facts, the Lawrence Defendants breached the parties’ ID Verification Agreement to verify the identity of the Bitcoin Seller for the parties’ transactions by doing so through a fraudulent passport. Further, as set forth more fully in the accompanying Memorandum of Law and Plaintiff’s Statement of Undisputed Material Facts, Defendants breached the Purchase Agreement, the Escrow Agreement and the BVFR Side Letter Agreement by releasing a portion of Zaftr’s purchase funds to the Bitcoin Seller before any Bitcoin was delivered to Zaftr, and by

failing to return almost all of Zaftr's purchase funds after Zaftr paid for Bitcoin that it never received.

WHEREFORE, Plaintiff respectfully requests that summary judgment be entered in favor of Plaintiff and against Defendants as to Count I of the Complaint.

Respectfully submitted,

BLANK ROME LLP

Dated: June 17, 2022

By: /s/ Lewis W. Schlossberg

Joseph G. Poluka (Pa. ID No. 42035)

Lewis W. Schlossberg (Pa. ID No. 91773)

Taylor K. Lake (Pa. ID No. 323120)

Blank Rome LLP

One Logan Square

130 N. 18th St.

Philadelphia, PA 19103

(215) 569-5500

Attorneys for Plaintiff Zaftr Inc.